

### SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed February 28, 2006. Claim 28 is amended and claims 28-34 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

#### Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 28-34 as anticipated under 35 U.S.C. § 102(b) by one or both of German Patent No. DE-003537653AZ to Betz *et al.* (“Betz”) and Japanese Patent Application No. JP-362229884A to Takesawa *et al.* (“Takesawa”). The Examiner also rejected claims 28-34 anticipated under 35 U.S.C. § 102(e) by U.S. Patent No. 6,653,724 to Kim *et al.* (“Kim”).

Applicants respectfully traverse the Examiner’s rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). For at least the reasons explained below, *Betz*, *Takesawa* and *Kim* cannot anticipate these claims because none of these references discloses every element and limitation recited in the claims.

Claim 28, as amended, recites a process combination including providing a housing having two or more solder pins projecting therefrom, positioning a frame

on the housing such that the solder pins are received in a corresponding number of holes in the frame, aligning the frame by moving it parallel and perpendicular to the solder pins, wherein the holes are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting “any part of the sidewalls of the holes” and “soldering the solder pins within the holes.”

In a previous Office Action, the Examiner conceded that *Betz* does not disclose that the solder pins can move within the circuit board holes without contacting the sidewalls of the holes. The Examiner, however, takes the position that *Betz* still discloses every element and limitation of the claim because in *Betz* the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes.

Applicants respectfully disagree. Even if, as the Examiner alleges, the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes, *Betz* still discloses that the pins must contact some part of the sidewall. *Betz* therefore cannot disclose, teach or suggest a method wherein holes in a frame are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting “any part of the sidewalls of the holes.” In addition to not disclosing that solder pins do not contact any part of the sidewalls of the holes, *Betz* also does not disclose that the solder pins are soldered within the holes; instead it discloses that solder is

placed in holes that are not occupied by pins. *Betz* therefore also cannot disclose, teach or suggest a method combination that includes “soldering the solder pins within the holes.”

In a previous Office Action, the Examiner also conceded that *Takesawa* does not disclose that the pins 46 can move within the holes in the circuit board without contacting the sidewalls of the holes. But as with *Betz*, the Examiner takes the position that *Takesawa* still discloses every element and limitation of the claim because in *Takesawa* the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes.

Applicants respectfully disagree. Even if, as the Examiner alleges, the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes, *Takesawa* still discloses that the pins must contact some part of the sidewall. *Takesawa* therefore cannot disclose, teach or suggest a method wherein holes in a frame are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting “any part of the sidewalls of the holes.” Moreover, as with *Betz*, *Takesawa* does not disclose that any solder is applied inside the holes in the printed circuit board, and therefore *Takesawa* cannot disclose, teach or suggest a method combination including “soldering the solder pins within the holes.”

Finally, in a previous Office Action the Examiner conceded that, like *Betz* and *Takesawa*, *Kim* fails to disclose pins that can move within the holes in the lens

cover 1 without contacting the sidewalls of the holes. As with *Betz* and *Takesawa*, however, the Examiner takes the position that *Kim* still discloses every element and limitation of the claim because in *Kim* the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes.

Applicants respectfully disagree. Even if, as the Examiner alleges, the pins entering the top of the holes do not contact the sidewalls at the bottom of the holes, *Kim* still discloses that the pins must contact some part of the sidewall. *Kim* therefore cannot disclose, teach or suggest a method wherein holes in a frame are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting “any part of the sidewalls of the holes.” For at least these reasons, Applicants submit that none of *Betz*, *Takesawa* or *Kim* can anticipate claim 28 and respectfully request allowance of the claim.

Regarding claims 29-34 if an independent claim is allowable, then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 28 is in condition for allowance. Applicants respectfully submit that claims 29-34 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

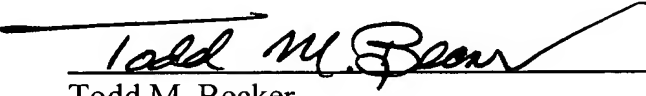
Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 5-30-06

  
\_\_\_\_\_  
Todd M. Becker  
Attorney for Applicant(s)  
Registration No. 43,487

Blakely, Sokoloff, Taylor & Zafman LLP  
12400 Wilshire Boulevard, Seventh Floor  
Los Angeles CA 90025-1030  
Phone: 206-292-8600  
Facsimile: 206-292-8606

Enclosures: Postcard  
Amendment transmittal, in duplicate